

REMARKS

This application has been reviewed in light of the Office Action dated June 15, 2009. Claims 2-4, 6-18, 39 and 40 are presented for examination, of which Claim 39 is in independent form. Favorable reconsideration is requested.

Claims 2-18, 39 and 40 were rejected under 35 U.S.C. § 112, second paragraph, as being indefinite. The Examiner states it is unclear how many handler systems are being claimed. Applicants respectfully disagree. A plurality of handler systems is recited in independent Claim 39. One feature of independent Claim 39 is a dispatcher configured to route each of a plurality of event requests to at least one of the plurality of handler systems. Further, another feature of independent Claim 39 is that all of the plurality of handler systems are enabled to invoke any of a worker utility. Applicants respectfully submit that Claim 39 is not indefinite since the claim recites a plurality of handler systems. Accordingly, reconsideration and withdrawal of the rejection are respectfully requested.

The Office Action states that Claims 2-18 and 39 are rejected under § 103(a) as being unpatentable over U.S. Patent No. 6,070,142 (McDonough et al.), in view of U.S. Patent No. 6,014,645 (Cunningham) and further in view of U.S. Patent Application No. 2001/0044840 (Carleton); and that Claim 40 is also rejected under § 103(a) as being unpatentable over U.S. Patent No. 6,070,142 (McDonough et al.), in view of U.S. Patent No. 6,014,645 (Cunningham) and further in view of U.S. Patent Application No. 2001/0044840 (Carleton). Applicants note that the Office Action does not appear to apply Carleton in the rejection of Claims 2-18 and 39. Applicants submit that independent

Claim 39, together with the claims dependent thereon, are patentably distinct from the cited prior art for at least the following reasons.

As discussed in the Amendment filed February 25, 2009, McDonough relates to a virtual customer and sales service center. As understood by Applicants, when a customer submits a request by phone, where the request is accepted by a void response unit (VRU) (*see* Fig. 4, 402), via the Internet (*see* Fig. 4, 430), etc., the request is sent to a context manager (*see* Fig. 4, 402), which passes the request to a service provider (*see* Fig. 4, 410), which analyzes the request and determines how to route the request to an appropriate resource to best handle the request.

The Office Action concedes McDonough fails to teach or suggest that at least one of a plurality of clients is enabled to add a new worker utility, as recited in independent Claim 39. The Office Action, however, relies upon Cunningham for disclosing the feature. Applicants respectfully disagree.

As also discussed in the Amendment filed February 25, 2009, Cunningham relates to a financial card application system (FCAS). The Office Action states that a card server in Cunningham corresponds to a “worker” without specifying what would correspond to a “client,” as recited in Claim 39, which submits one or more event requests. As understood by Applicants, Cunningham does not discuss who and what would supply a card server to the FCAS, but only when a card server would be added – depending on the total amount of transaction in the system (*see* col. 3, lines 46-52 of Cunningham, for example). It could very well be an administrator or manager of the FCAS who introduces a new card server, where such a person does not submit any event request to the FCAS and

thus would not correspond to the client of Claim 39. However, this is far from a client adding a new worker.

Cunningham discloses the number of servers 24-34 in the system may be increased or decreased depending on the number of transactions processed during a given period of time, as discussed in the Response to Argument of the Office Action on page 3. Cunningham does not disclose who or what adds the servers when increased or decreased. Further, Cunningham merely discloses the number of servers is changed depending on the number of transactions. Cunningham is silent regarding any of the users being capable of adding new servers. On the contrary, it would not make sense in Cunningham to allow a user, who is merely applying for a credit card, to change the number of servers. Cunningham, therefore, fails to teach or suggest at least one of a plurality of clients is enabled to add a new worker utility and further, the new worker utility is configured by at least one of a corresponding client and one of a handler system to be re-used by any of one of the plurality of clients, as recited in independent Claim 39.

Carleton is not understood to remedy the above-noted deficiencies of McDonough and Cunningham. Carleton relates to a method and system for real-time monitoring and administration of computer networks. However, Carleton also fails to teach or suggest at least one of a plurality of clients is enabled to add a new worker utility and the new worker utility is configured by at least one of a corresponding client and one of a handler system to be re-used by any of one of the plurality of clients, as recited in independent Claim 39.

Accordingly, McDonough, Cunningham, and Carleton, whether taken individually or in combination, fail to teach or suggest many features of the present invention as recited in independent Claim 39.

Accordingly, Applicants submit that independent Claim 39 is patentable over the cited art, and respectfully request withdrawal of the rejections under 35 U.S.C. § 103(a).

The other rejected claims in this application depend from independent Claim 39 discussed above and, therefore, are submitted to be patentable for at least the same reasons. Since each dependent claim is also deemed to define an additional aspect of the invention, individual consideration or reconsideration, as the case may be, of the patentability of each claim on its own merits is respectfully requested.

In view of the foregoing remarks, Applicants respectfully request favorable reconsideration and early passage to issue of the present application.

No petition to extend the time for response to the Office Action is deemed necessary for this Request for Reconsideration. If, however, such a petition is required to make this Request for Reconsideration timely filed, then this paper should be considered such a petition and the Commissioner is authorized to charge the requisite petition fee to Deposit Account 50-3939.

Applicants' undersigned attorney may be reached in our Washington, D.C. office by telephone at (202) 530-1010. All correspondence should continue to be directed to our below listed address.

Respectfully submitted,

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